

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:  
  
ALL CASES

**ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
FILED UNDER SEAL**

Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs move the Court to consider whether certain documents marked confidential by Uber should be sealed.

**Material To Be Filed Under Seal**

The documents to be filed under seal are Exhibits to Plaintiffs' Motion to Compel Custodial Discovery (ECF No. 1137). Plaintiffs request the Court consider whether the following should be filed under seal:

Document	Description	Designating Party
ECF No. 1137-2, Exhibit 1 to the Declaration of Roopal Luhana In Support of Plaintiffs' Motion to Compel Custodial Discovery	A document created by Uber marked Highly Confidential – Attorneys' Eyes Only.	Uber
ECF No. 1137-3, Exhibit 2 to the Declaration of Roopal Luhana In Support of Plaintiffs' Motion to Compel Custodial Discovery	A document created by Uber marked Highly Confidential – Attorneys' Eyes Only.	Uber

Under Local Rule 79-5(f)(3), the Designating Party bears the responsibility to establish that all of the designated material is sealable, and must “file a statement and/or declaration as described in subsection (c)(1)” of the Local Rules. None of the information at issue was marked confidential by Plaintiffs.

This motion complies with Civil Local Rule 7-11 and 79-5, and is accompanied by the following attachments:

1. The Declaration of Sarah R. London in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: August 20, 2024

Respectfully submitted,

By: /s/ Sarah R. London

Sarah R. London (SBN 267093)

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By: /s/ Roopal P. Luhana

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